

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
FOWZI ABDINASIR ELMI,)
Defendant.)

**MOTION TO COMPEL
DISCLOSURE OF 404(b) EVIDENCE**

Fowzi Abdinasir Elmi, through undersigned counsel, hereby moves the Court for an Order compelling the government to immediately disclose any "bad act" or "similar course of conduct" evidence it intends to offer at trial pursuant to Rule 404 of the Federal Rules of Evidence and further directing the government to identify the witnesses through whom such evidence will be presented at trial. This motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: January 24, 2021

LAW OFFICE OF JORDAN S. KUSHNER

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